

REMARKS

Claims 1-98 are pending in the application.

Claims 1-98 stand rejected.

Claims 1, 12, 23, 37, 46, 55, 65, 73, 81 and 89 have been amended.

Rejection of Claims under 35 U.S.C. §102

Claims 1-98 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Mathon, et al., U.S. Patent Publication No. 2001/0042131 (Mathon).

While not conceding that the cited reference qualifies as prior art, but instead to expedite prosecution, Applicant has chosen to respectfully disagree and traverse the rejection as follows. Applicant reserves the right, for example, in a continuing application, to establish that the cited reference, or other references cited now or hereafter, do not qualify as prior art as to an invention embodiment previously, currently, or subsequently claimed.

Independent claim 1, as amended, is representative of amended independent claims 12, 23, 37, 46, 55, 65, 73, 81 and 89, and now recites:

1. An inter-module communication comprising:
a message, wherein
said message comprises customer relations management system information and
other customer relations management system information,
said customer relations management system information comprises at least one of
agent information and work item information,

said agent information comprises information regarding an agent,
said work item information comprises information regarding a work item,
said other customer relations management system information is other than said
agent information and said work item information,
said other customer relations management system information comprises at least
one of a command, a request and a notification, and
said message is configured to be pushed from a customer relations management
system by virtue of at least a portion of said message being encoded in a
markup language.

Support for the amendments presented herein can be found at least at p. 21, ll. 24-29; p. 23, ll.1-9; p. 40, ll. 15-23; and Figs. 1A-1K, 2A, 2B and 3.

As an initial matter, Applicant respectfully notes the particular parts of the cited reference that has been relied upon have not been designated as nearly as practicable, and the pertinence of the reference has not been clearly explained, both as required by 37 C.F.R. § 1.104(c)(2). In particular, Applicant respectfully submits that the pertinence of the cited portions of Mathon have not been provided at all. Applicant respectfully asserts that simply citing one or more paragraphs of a reference, as in some way purporting to teach or be relevant to a given claim limitation, sans any explanation thereof, is wholly inadequate in meeting both the relevant sections of the MPEP and 37 C.F.R. Nevertheless, Applicants has made every effort to respond to the rejections outlined in the Office Action.

Applicant further respectfully submits that “[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegall Bros. V. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Applicant respectfully submits that the Office Action fails

to demonstrate that the reference shows, teaches or even suggests several of the foregoing limitations, using claim 1 as an example. To wit:

...

said message comprises customer relations management system information and
other customer relations management system information,

...

said agent information comprises information regarding an agent,

...

said other customer relations management system information is other than said
agent information and said work item information,

...

No citation to any portion of Mathon is provided for the above-listed limitations whatsoever. Applicant therefore respectfully submits that the Office Action thus fails in its burden of demonstrating that Mathon does indeed teach each and every limitation of the claimed invention, a objective which Applicant maintains Mathon fails to achieve. This comes as no surprise, in fact, because Mathis is not directed to the claimed inter-module communication, method therefor, computer system configured thusly, computer program product, inter-module interface definition and apparatus, given that Mathon is directed to:

“... the efficient and secure transfer of information over a distributed
computer network such as the Internet. The system provides parallel
communication paths between the source and destination. Each path includes a
dedicated route point to eliminate intermediate ISPS. Each source is associated

with an archive and each route point is coupled to the archive. Upon receipt of the message at a route point the message is copied to the archive and then transmitted to the destination. Message archival and storage of transmission-related information enables data-mining features not presently available using email or a point-and-click browser. Since two messages are transmitted from the source to the common destination across separate and distinct communication paths, message latency is improved and the chance of lost messages is reduced or even eliminated. A network controller monitors transmission results and dynamically re-configures the network to balance loading across the route points and to avoid failures or other bottlenecks in the system.” (Mathon, Abstract)

As will be appreciated, Mathon fails to teach the limitations of the independent claims, as Mathon is directed to the efficient and secure transfer of information over a distributed computer network such as the Internet. The information being communicated, its constituent parts, the purpose and mechanisms of its transmission and other features of the claimed invention are simply not taught by Mathon. For example, Mathon is completely oblivious to a message that comprises customer relations management system information and other customer relations management system information, because Mathon is not concerned with the type of data being conveyed, merely that the data is conveyed efficiently and securely.

In this regard, Applicant respectfully notes that the amendments made to, for example, the last limitation of

said message is configured to be pushed from a customer relations management system by virtue of at least a portion of said message being encoded in a markup language


As will be appreciated, Mathon fails to teach such a message, and more so, that the message is configured to be pushed from a customer relations management system by virtue of at least a portion of the message being encoded in a markup language. Once again, being directed to the efficient and secure transfer of information, and not with a customer relations management system, Mathon would not be expected to concern itself with such technologies.

Applicants respectfully submit, therefore, that independent claims 1, 12, 23, 37, 46, 55, 65, 73, 81 and 89 are allowable over Mathon and Applicant respectfully urge that the §102 rejection of claims 1, 12, 23, 37, 46, 55, 65, 73, 81 and 89 be withdrawn. Applicants further respectfully submit that dependent claims 2-11, 13-22, 24-36, 38-45, 47-54, 56-64, 66-72, 74-80, 92-88 and 90-98 are allowable as depending upon allowable base claims in addition to being allowable for various other reasons.

CONCLUSION

In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5084.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on December 12, 2006.

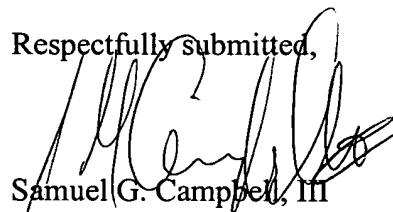


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12/12/06

Date of Signature

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